

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

JOHN NOAKES

Plaintiff

v.

CASE WESTERN RESERVE
UNIVERSITY,

Defendant

Case No. 1:21-cv-1776-PAB

Judge: BARKER

CHRONOLOGY

Plaintiff John Noakes respectfully submits this Chronology of Significant Events to aid the Court in the consideration of Plaintiff's Motion for Preliminary Injunction. (Doc#2.)

Date and Time	Event	Source
April 15, 2021 4:20 pm	Parker informs Ricanati that Noakes “was found not responsible by a panel” in Title IX matter.	April 15, 2021 Email (Doc#29-7)
April 15, 2021 6:24 pm	Ricanati emails Parker. “He just posted the attachment on the class GroupMe and students are furious.”	April 15, 2021 Email (Doc#29-7)
April 15, 2021 7:00 pm	Parker, at urging of Ricanati, speaks to Noakes and his advisors on Zoom. Parker is visibly upset at outcome of hearing and told Noakes he needed to “watch himself”	Verified Complaint ¶72 (Doc#1); Parker Depo. at 31-33 (Doc#29-1)
April 15, 2021 various times	Students Email administrators. Emails mentioned the GroupMe post. Emails also expressed concerns about “the stories that came out several month ago” and describe Noakes as a “perpetrator of sexual violence.”	April 15, 2021 Emails from Students (Doc#29-8; Doc#29-9; Doc#29-10)
April 16, 2021	Email sent to medical school warning against “unprofessional” uses of electronic communications.	April 16, 2021 Email (Doc#29-11)
April 19, 2021	Ricanati speaks to Noakes on phone. Ricanati threatens “institutional discipline” but refused to tell Noakes which, if any, rules were broken. Ricanati refused to allow Noakes have his advisor present.	Verified Complaint ¶75 (Doc#1)
April 19, 2021	Noakes submits retaliation complaint against Parker and Ricanati.	April 19, 2021 Email (Doc#29-12)
April 19, 2021	Noakes and Ricanati exchange emails. Noakes asks for copies of Early Concerns; Ricanati refers him to “general counsel for assistance.” Noakes writes, “Please confirm that you will no longer be participating in this matter pending the resolution and investigation of my Title IX retaliation claim.”	April 19, 2021 Emails (Doc#29-13)

April 20, 2021	Note posted in restroom at Medical School: "1st year Med Student [John Noakes] is a <u>RAPIST!</u> Why is he still here? Share and seek justice."	April 20, 2021 Email (Doc#29-14)
April 21, 2021	Students, but not Noakes, are invited to meeting about CWRU Title IX process.	April 21, 2021 Email (Doc#29-15)
April 21, 2021	Ricanati and Greenfield corroborate on email to be sent to Noakes about early concerns.	April 21, 2021 Emails (Doc#29-16)
April 24, 2021 (approximate)	Ricanati meets with students on Zoom call to discuss Noakes matter	Ricanati Depo. at 41 (Doc#29-2)
April 25, 2021 (approximate)	Class Survey circulated. Provides link to Early Concern form.	Class Survey (Doc#29-17)
April 26, 2021	Noakes and Greenfield exchange Emails. Noakes expresses concerns that the "PWG process... is retaliatory in nature" and declines to participate. Greenfield sends message to Ricanati and Logio. Noakes expresses "concern" with Ricanati's "ongoing involvement in this matter" due to retaliation complaint.	April 26, 2021 Emails (Doc#26-19)
April 26, 2021	Student Meeting (without Noakes) about CWRU Title IX process. Ricanati "informed the students that we have a process at the School of Medicine..."	Ricanati Depo. at 43 (Doc#29-2)
April 25, 2021 to April 28, 2021	29 "Early concerns" are submitted	Early Concerns (Doc#29-20)
May 6, 2021 (approximate)	Petition circulates: "The School of Medicine ought to take clear and decisive action by expelling [Noakes]."	Petition (Doc#29-18)

May 15, 2021	Jane Roe is informed that PWG/COS will not be dismissing Noakes. Text message in group of administrators including Ricanati and Greenfield: "She might spread the word. Wanted you to know in case it becomes an M1 thing."	Text Messages (Doc#29-21)
May 25, 2021	Noakes matter considered by PWG	Greenfield Depo. at 86 (Doc#29-3)
May 25, 2021	Noakes matter reviewed by PWG. Text message from Greenfield and a PWG Member: "PWG did not go well for [Noakes... I'm just very angry right now."	Text Messages (Doc#29-22)
May 25, 2021	Jane Roe sends email to Ricanati, Greenfield, and other administrators. Refers to Noakes as a "rapist." Asks, "Is anything going to be done?" and threatens legal action against school.	May 25-26, 2021 Emails (Doc#29-23)
May 26, 2021	Ricanati responds to Jane Roe Email, "I am sorry this has happened and I acknowledge the toll on your life and education."	May 25-26, 2021 Emails (Doc#29-24)
June 15, 2021	Ricanati informed of students "belittling or humiliating" Noakes and "ignoring him and excluding him from groups."	June 15, 2021 Email (Doc#29-25)
August 2, 2021	Email exchange between Greenfield and Noakes. Noakes indicates he will not take a leave of absence. Greenfield expresses belief leave of absence "would naturally separate you from [Jane Roe] and other people who may be distressed... AND we can't predict how inflamed the class still is."	August 2, 2021 Emails (Doc#29-26)
August 3, 2021	Email from Greenfield. "[H]e told me yesterday he is not taking a year off. I tried to re-convince him... UGH."	August 3, 2021 Emails (Doc#29-27)
August 15, 2021	Letter to Noakes stating the COS "may issue sanctions including... dismissal"	August 15, 2021 Letter (Doc#29-28)
August 19, 2021	COS states that Noakes "must continue with coaching... and present a new reflection"	August 23, 2021 Letter (Doc#29-29)

September 1, 2021	Noakes meets with Greenfield. Greenfield states that Title IX only makes things worse, and even though it is the “legal thing to do,” that John Noakes should not pursue Title IX claim against Roe or Ricanati.	Verified Complaint ¶93 (Doc#1)
September 7, 2021	Noakes speaks with Greenfield on phone. Greenfield states, “[Y]ou need to not make your own Title IX report... You need to just hunker down and do your own stuff if you’re going to stay in the class.” Greenfield states the retaliation complaints were “ill advised” and told Noakes, “You’re digging yourself a hole, honey.” Greenfield told Noakes he needed to stop “looking like you’re causing problems” and “I can’t protect you.”	Verified Complaint ¶96 (Doc#1); Transcript of Call (Doc#29-30)
September 24, 2021	Letter to Noakes stating the COS “may issue sanctions including... dismissal” related to GroupMe post	September 24, 2021 Letter (Doc#29-31)